

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMAS S. NEUBERGER; JERRY L.
MARTIN; WILLIAM R. HAGUE, JR.;
DELAWARE STATE SPORTSMEN’S
ASSOCIATION, INC; and BRIDGEVILLE
RIFLE & PISTOL CLUB, LTD.,

Plaintiffs.

v.

NATHANIAL MCQUEEN, JR., in his
official capacity as Cabinet Secretary
Delaware Department of Safety and
Homeland Security; and COL. WILLIAM
CROTTY, in his official capacity as
superintendent of the Delaware State Police,

Defendants.

Civil Action No. 1:24-cv-
00590-MN

**PLAINTIFFS’ MOTION FOR LEAVE TO AMEND AND
SUPPLEMENT THE FIRST AMENDED COMPLAINT**

Plaintiffs Thomas S. Neuberger; Jerry L. Martin; William R. Hague, Jr.; Delaware State Sportsmen’s Association (DSSA); and Bridgeville Rifle and Pistol Club, Ltd. (BRPC) (collectively, “Plaintiffs”), by counsel, hereby move the Court, pursuant to Rules 15(a)(2) and 15(d) of the Federal Rules of Civil Procedure, for an order granting the Plaintiffs leave to amend and supplement their First Amended Complaint. The grounds for this motion are set forth in the Plaintiffs’ Memorandum

of Law in Support of Motion for Leave to Amend and Supplement the First Amended Complaint filed concurrently herewith.

Respectfully submitted,

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Dated: February 11, 2025

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